

EXHIBIT A

**UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA**

INSIGNIA SYSTEMS, INC.,

Civ. No. 19-cv-1820 (MJD/BRT)

Plaintiffs,

v.

NEWS CORPORATION, NEWS
AMERICA MARKETING FSI L.L.C.,
and NEWS AMERICA MARKETING
IN-STORE SERVICES L.L.C.,

Defendants.

Chart of Parties' Disputed Scheduling Proposals

¶	DISPUTED EVENT	PLAINTIFF'S PROPOSAL	DEFENDANTS' PROPOSAL ¹
(e)(2)	Close of Fact Discovery	May 22, 2020	October 16, 2020
(g)(4)	Fact Discovery Motions	May 22, 2020	October 30, 2020
(f)(1)(c)	Expert Meet & Confer	March 13, 2020	August 28, 2020
(f)(2)	Opening Expert Reports	June 26, 2020 (Any party bearing the burden)	November 16, 2020 (Plaintiff)
(f)(2)	Rebuttal Expert Reports	August 7, 2020 (Any party responding)	January 15, 2021 (Defendants)
(f)(2)	Close of Expert Discovery	September 11, 2020	March 31, 2021
(g)(4)	Other Non-Dispositive Motions	October 16, 2020	April 30, 2021
(g)(5)	Dispositive Motions	October 16, 2020	May 29, 2021
(j)(1)	Trial	November 30, 2020	October 30, 2021

¹ Defendants' position is that discovery should be stayed pending the resolution of an early dispositive motion under Rule 12(c) on Defendants' Counterclaim. As explained in part (e) of the joint report, resolution of such a motion will clarify and may help to streamline considerably the scope of discovery required in this matter. Defendants propose the dates listed here in the alternative, should the Court determine not to put in place a stay.